

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
GREEN COPPER HOLDINGS, LLC)	CASE NO. 25-10088-T
EIN # xx-xxx9708)	Chapter 7
)	
COPPER TREE, INC.)	Substantively Consolidated
EIN # xx-xxx6608)	
)	
Debtors.)	

**TRUSTEE’S OBJECTION TO CLAIM NO. 3 FILED HEREIN BY NOLA RENEE
NICHOLS (“NICHOLS”) FOR THE SUM OF \$396,975.00 AND NOTICE OF
OPPORTUNITY FOR HEARING**

Comes now the Trustee and states:

1. Claim No. 3 was filed by Nichols in the Green Copper Holdings, LLC case for the sum of **\$396,975.00** for alleged “Unpaid Contract Services – Accounting / Bookkeeping.”
2. The documents attached to the proof of claim do not support the sums sought to be recovered.
3. At all times material Nichols was an insider of the Debtor, and the asserted claim exceeds the reasonable value of services provided to the Debtor. As a result, Claim 3 should be denied to the extent the amount of the claim exceeds the value of any services pursuant to 11 U.S.C. § 502(b)(4).
4. The Trustee intends to seek an order disallowing Claim No. 3 in its entirety or allowing such Claim in a limited equitable sum under *quantum meruit* principles.

NOTICE OF OPPORTUNITY FOR HEARING - Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than 33 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 33-day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f).

Respectfully Submitted by:

/s/ Patrick J. Malloy III
Patrick J. Malloy III, OBA #5647
MALLOY LAW FIRM, P.C.
401 S. Boston Ave. Suite 500
Tulsa, Oklahoma 74103
Telephone: 918-699-0345
Fax: 918-699-0325
ATTORNEYS FOR TRUSTEE